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POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

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**POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY**

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**AMERICAN BANKERS ASSOCIATION AND
NATIONAL ASSOCIATION OF PRESORT MAILERS
JOINT INTERROGATORIES TO E-STAMP WITNESS JONES
(ABA&NAPM/E-STAMP-T1-1-6)
(June 19, 2000)**

Pursuant to Sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the American Bankers Association and the National Association of Presort Mailers hereby submit these joint interrogatories and requests for production of documents. If the witness to whom an interrogatory is directed is unable to answer the interrogatory or produce the requested documents and another person is able to do so, the interrogatory or request should be referred to such person.

If data requested are not available in the exact format or level of detail requested, any data available in (1) substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The terms "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96.

ABA&NAPM / E-Stamp-T1 -1. Please confirm that IBI First Class Letter Mail ("FCLM") will be delivered to the USPS collection system as single piece mail, and will not be presented to the USPS in trays, banded and sleeved.

ABA&NAPM/ E-Stamp-T1-2. If the Postal Service, not the "shipper," will have to tray, sleeve, label and strap the trays with mail prepared with PC Postage, how is this more efficient for the Postal Service than when it is able to merely cross dock trays that are sleeved, labeled, and strapped when they arrive at the BMEU, (and not just any postal facility)?

ABA&NAPM/ E-Stamp-T1-3. Do you agree that mail prepared with PC Postage will have to be culled and segregated from other collection box mail on an USPS AFCS and then sorted at least once, and probably twice, to achieve the same level of sortation as automation mail which qualifies for the basic automation FCLM rate? If you do not agree, state each reason you have for disagreeing.

ABA&NAPM/ E-Stamp-T1-4. Please refer to the statement in your testimony at Page 8, Line 16 where you state, "Inspections are not necessary because the software has insured compliance."

- a. Are you aware of any instances in the past five years where individuals have tampered with ANY type of software program and caused problems with the accuracy or security of such programs?
- b. Why would it not be necessary for the USPS to inspect all IBI FCLM to assure that the postage has not been underpaid (e.g., mail weighing more than one ounce with insufficient postage)? Please explain if you believe it is not necessary for the USPS to make an inspection of IBI FCLM for such purpose.
- c. Please explain why it would not be necessary for USPS to inspect IBI FCLM to assure that the indicia is legible.
- d. Please explain why it would not be necessary for USPS to inspect IBI FCLM to assure that such mail is of the proper size, shape and dimension, particularly where the IBI indicia may have been placed on a label which has been placed on

the mail.

- e. Please explain why the USPS would not have to inspect IBI FCLM to assure that the indicia is not counterfeit and that it has been printed from an authorized software package which will result in appropriate compensation to the USPS for such mail.

ABA&NAPM/ E-Stamp-T1-5. Please refer to the "address cleansing" features of the PC Open System which you discuss at Page 9, Line 14 and Page 10, Line 6 of your testimony. Will customers using your client's Open PC Postage Product be required to check the accuracy of the mail piece address against a current address-matching list every six months? Will this address updating process be the same as required for mail receiving worksharing discounts? Please explain your answer."

ABA&NAPM/E-Stamp-T1-6. Please refer to Page 9, Line 11 of your testimony where you state that "For all of the discounted postage products the customers only have to perform this address cleansing on a voluntary basis . . ." Please reconcile this statement with the fact that automated FCLM must comply with move update requirements.

Respectfully submitted,

AMERICAN BANKERS ASSOCIATION
NATIONAL ASSOCIATION OF PRESORT MAILERS

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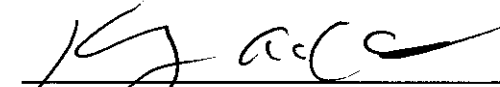
Counsel for
National Association
of Presort Mailers

Counsel for
American Banker Association

Date: June 19, 2000
Washington, D.C.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.


Henry A. Hart

June 19, 2000